

# AHMAD KESHAVARZ

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June 19, 2017

VIA ECF

Honorable Alvin K. Hellerstein  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1050  
New York, NY 10007

**Re: Request for one-day extension of deadline to file reply in support of  
Plaintiff's motion for summary judgment. DE 84.  
*Victor Callender v. Forster & Garbus, LLP, et al*, 1:15-CV-05813-AKH,  
Southern District of New York**

Dear Judge Hellerstein:

The undersigned represents Plaintiff Victor Callender in this Fair Debt Collection Practices Act case. Plaintiff seeks a one-day extension of her deadline to file a reply in support of her motion for summary judgment. Plaintiff respectfully requests that the deadline be extended from June 19, 2017 to June 20, 2017. Plaintiff apologizes for this belated request. Given the timing of this request, Plaintiff was unable to confer with counsel for Defendant to ascertain whether Defendant would agree. This is Plaintiff's first request for an extension of this deadline.

The undersigned was tied up last week with four court ordered depositions and unexpected motion practice that took up the majority of my time and energy. Today my morning was spent negotiating settlement agreements in two FDCPA suits that are each over three years old. I hadn't expected these cases to settle today, but I needed to finalize the settlements by the end of the day because both cases had court ordered mediations set to take place tomorrow in the absence of a settlement. The Defendants in those cases live out of state, and would have had to fly here in order to participate in the mediations. It was therefore crucial to finalize the settlement agreements prior to the date set for the mediation. Both cases settled this morning, thus obviating the need for the mediations and saving the parties substantial costs arising from the mediations. This crowded out the time I had set aside to draft the reply.

In addition to the scheduling issues described above, my ability to draft an adequate reply was further complicated because the internet in my office went out for 30 minutes today due to the storm, and the software that I use to remotely access my work files was not working correctly.

Plaintiff understands that this is a belated request and the undersigned apologizes for failing to file this letter earlier. Simply put, the unanticipated scheduling conflicts described above

prevented me from being able to draft an adequate reply before the deadline. Plaintiff respectfully requests that his deadline to reply be extended by one day from June 19, 2017 to June 20, 2017.

Respectfully,

/s/

Ahmad Keshavarz

cc: all attorneys of record via ECF